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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

MAY 4 1984

Mr Bill Fitch
U S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

RE: Operable Unit 15
Technical Memorandum 1

Dear Mr Fitch:

The Environmental Protection Agency (EPA) has reviewed Technical Memorandum No. 1 for OU 15 and finds it generally acceptable with the exceptions expressed in comments from the Colorado Department of Health (CDH) and enclosed EPA comments. This finding is made with the understanding that DOE intends to continue using the buildings encompassing OU 15 as radiological work areas.

Enclosed please find EPA's review comments pertaining to the referenced document. Also included are comments pertaining to the general direction of the project.

If you have any questions concerning our comments, please contact David Maxwell at (303) 294-1082.

Sincerely,

A handwritten signature in dark ink, appearing to read "Martin Hestmark", is written above the typed name.

Martin Hestmark, Manager
Rocky Flats Project

ADMIN RECORD



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TECHNICAL MEMORANDUM 1
OPERABLE UNIT 15

GENERAL COMMENTS

CDH comments consider the contamination associated with RCRA constituents of concern, but do not address radioactive contaminants. It is EPA's understanding that CDH is not requiring DOE to remove radioactive contamination in order to close units under RCRA. The exception to this is RCRA Unit 63 (IHSS 212). The radioactive contamination associated with IHSSs 178, 179, 180, 204, 211 and 217 will therefore be addressed solely under CERCLA. As the lead regulatory agency, CDH will approve CERCLA decisions based on EPA guidance.

It is EPA's position that radioactive contamination associated with OU 15 IHSSs cannot be practically regarded without considering the future plans for and the cleanup of the entire building or at least the area around the IHSSs. As previously stated, EPA's understanding is that the buildings will continue to be radiological work areas under the control of DOE. This understanding is based on conceptual planning information from DOE but has not been formalized. It will therefore be necessary for DOE to establish concrete plans for the use of the buildings before remedial decisions can be made concerning individual IHSSs. Planning information concerning the future use of the buildings needs to be formalized and needs to involve EPA.

The OU 15 RFI/RI will need to be re-evaluated if future use of buildings is revised. Further, if radiological work continues, the controls in place to assure safety of radiological workers will need to be identified and approved as an IM/IRA.

SPECIFIC COMMENTS

The radiological sampling and survey data does not characterize the nature and extent of contamination that may be present underneath or imbedded in painted surfaces. This is particularly true of alpha emitting isotopes such as Plutonium 239/240. The data is therefore insufficient to address risk posed in a unrestricted industrial/commercial use scenario nor does it allow us to verify achievement of standards. If DOE intends to use the buildings for purposes other than radiological work then further sampling will be necessary in order to obtain sufficient data to support a risk assessment for the intended use of the buildings and/or to determine if the appropriate standards have been met.

The sampling data is sufficient to evaluate the risk or dose rates to radiological workers in a radiological work setting. This is assuming controls are in place that would prevent re-suspension of contaminants that may be beneath or imbedded in the

paint.

When comparing pre-rinsate to post-rinsate smear samples for IHSS 179 it appears that radiological contamination is increased in the post-rinsate samples. This situation needs to be further evaluated. It could be an analytical error, statistical fluke, or an observation that is relevant to the nature of the contamination.